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14 DOLLAR TREE STORES, INC. and FRANK SCOTT

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

19 RONALD M. MAROVICH,

Case No.: C 06-02329 TEH

**Plaintiff,**

21 || vs.

**STIPULATION AND [PROPOSED]  
ORDER TO FURTHER EXTEND TIME  
FOR DEFENDANT FRANK SCOTT TO  
RESPOND TO COMPLAINT**

22 DOLLAR TREE STORES, INC., a  
23 Corporation, FRANK SCOTT, an individual,  
and DOES I through X, inclusive

### Defendants.

## **STIPULATION**

27 WHEREAS, Plaintiff Ronald M. Marovich (“Plaintiff”) intends to file a Motion for  
28 Remand, and defendant Frank Scott (“Scott”) intends to file a Motion to Dismiss; and  
SE#1002548.v1 1

WHEREAS, Plaintiff and Scott have stipulated and proposed to the Court that their respective motions be briefed and heard concurrently; and

WHEREAS, based upon the current schedule of Plaintiff's counsel, Plaintiff does not have sufficient time to prepare his Motion for Remand by August 21, the existing deadline for Scott's response to the Complaint,

NOW THEREFORE, Plaintiff and Scott hereby stipulate that the deadline for Scott to respond to Plaintiff's Complaint shall be extended further, to and including September 18, 2006.

## IT IS SO STIPULATED.

Dated: August 16, 2006

## LAW OFFICE OF DENNIS L. KENNELLY

By /s/ Dennis L. Kennelly  
Dennis L. Kennelly  
Attorneys for Plaintiff

Dated: August 16, 2006

## THELEN REID & PRIEST LLP

By /s/ Seth L. Neulight  
Seth L. Neulight  
Attorneys for Defendants  
DOLLAR TREE STORES, INC. and FRANK  
SCOTT

## **[PROPOSED] ORDER**

Pursuant to the parties' stipulation, the deadline for defendant Frank Scott's response to the Complaint shall be extended to and including September 18, 2006.

IT IS SO ORDERED.

Dated: 08/17/06

Hilary Henderson

HONORABLE THELTON E. HENDERSON  
United States District Judge